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25 UNITED STATES DISTRICT COURT
26 FOR THE NORTHERN DISTRICT OF CALIFORNIA
27 SAN FRANCISCO DIVISION

28
29 REBECCA ALLISON GORDON, JANET AMELIA)
30 ADAMS and AMERICAN CIVIL LIBERTIES UNION)
31 FOUNDATION OF NORTHERN CALIFORNIA,) Case No. C-03-1779 CRB
32)
33 Plaintiffs,) **STIPULATION OF**
34 v.) **COMPROMISE AND**
35 FEDERAL BUREAU OF INVESTIGATION, et al.,) **SETTLEMENT OF**
36 Defendants.) **PLAINTIFFS' CLAIM**
37) **FOR ATTORNEYS' FEES**
38) **AND COSTS AND**
39) **PROPOSED ORDER**

1 Subject to approval of the Court, plaintiffs Rebecca Allison Gordon, Janet Amelia Adams
2 and American Civil Liberties Union Foundation of Northern California, and Defendants Federal
3 Bureau of Investigation (FBI), Department of Justice and Transportation Security Administration
4 (TSA) hereby stipulate and agree as follows:

5 1. On June 29, 2005, this Court entered in the above-captioned matter a judgment in
6 favor of plaintiffs in part and in favor of defendants in part under the Freedom of Information
7 Act, 5 U.S.C. § 552.

8 2. On October 24, 2005, the Court signed a Stipulation and Order which enlarged the
9 time for plaintiffs to file a motion for attorneys' fees until January 15, 2006.

10 3. The parties have now reached an agreement to compromise and settle all claims
11 against defendants for attorney's fees, costs and expenses in this litigation for \$200,000.00, which
12 amount shall be paid by the United States to the American Civil Liberties Union Foundation of
13 Northern California, 1663 Mission Street, Suite 460, San Francisco, California 94103.

14 4. Payment of the amount described in paragraph 3 of this Stipulation shall
15 constitute full satisfaction of any and all obligations of the United States for attorney's fees, costs
16 and expenses in this litigation under 5 U.S.C. § 552(a)(4)(E) and any other provision of law
17 authorizing an award of attorney's fees and costs. In consideration of the payment described in
18 paragraph 3 above, plaintiffs, and each of them, hereby waive, forego, and forever discharge the
19 United States, the United States Department of Justice, the Federal Bureau of Investigation, the
20 United States Department of Homeland Security, the Transportation Security Administration,
21 and their agents, employees, successors and assigns, from any and all liability for attorney's fees,
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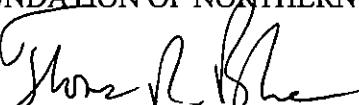
1 litigation costs, or any other expenses of any kind that have been or may be incurred in
2 connection with this litigation.
3

4 Dated: January 18, 2006

5 AGREED:

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7 THOMAS R. BURKE
8 SUSAN E. SEAGER
9 DAVIS WRIGHT TREMAINE LLP

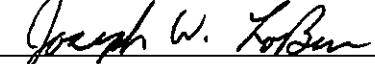
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12 FOUNDATION OF NORTHERN CALIFORNIA

13 By: 
14 Attorneys for Plaintiffs Rebecca Allison Gordon,
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JOSEPH W. LOBUE
U.S. DEPARTMENT OF JUSTICE

By: 
17
18 Attorneys for Defendants
19 U.S. Department of Justice,
20 Federal Bureau of Investigation, and
21 Transportation Security Administration

ORDER

22 Pursuant to the Stipulation of the parties, it is SO ORDERED.
23

24 Dated: January 24, 2006

25 Honorable Charles R. Breyer
26 United States District Court
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